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★ FEB 20 2011 ★

SCF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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11-0185M

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

ISMAEL TORRES-RAMOS,

(21 U.S.C. §§ 841(a)(1)
and 841(b)(1)(A)(ii)(II)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH MOGENIS, being duly sworn, deposes and states that he is a Detective with the New York City Police Department, assigned to the Drug Enforcement Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about February 18, 2011, within the Eastern District of New York and elsewhere, defendant ISMAEL TORRES-RAMOS did knowingly, intentionally and unlawfully possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about February 18, 2011, the defendant ISMAEL TORRES-RAMOS arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Airlines Flight No. 576 from San Juan, Puerto Rico.

2. Following his arrival, the defendant collected two checked bags from the luggage carousel in the airport's baggage claim area. The undersigned approached the defendant after he appeared to be purposely evading law enforcement stationed in the airport near the baggage claim, and after the defendant began looking around the airport nervously while exiting with his luggage.

3. The undersigned asked defendant ISMAEL TORRES-RAMOS whether the two bags he was carrying were his. After confirming that the bags and their contents belonged to him, the defendant consented to a search of his luggage.

4. The undersigned opened the defendant's two suitcases and found each of them to be almost completely filled with packages of a white powdery substance. That substance was subsequently field tested, and the test indicated that the substance was positive for the presence of cocaine.

5. The defendant was subsequently arrested. The total gross weight of the cocaine concealed in defendant ISMAEL TORRES-RAMOS suitcases at the time of his arrival in New York was approximately 35,000 grams.

6. The defendant was read his Miranda warnings, which he said he understood and agreed to waive. Defendant then admitted in sum and substance that he suspected his bags contained illegal drugs, and that he expected to receive \$10,000 for making the trip from Puerto Rico.

WHEREFORE, your deponent respectfully requests that the defendant ISMAEL TORRES-RAMOS be dealt with according to law.

Det J K Moyn

JOSEPH MOGENIS
Detective
New York City Police Department
Drug Enforcement Task Force

Sworn to before me this
20th day of February, 2011

S. E. Thomas Boyle
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK